## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

FINJAN LLC,	)
Plaintiff,	)
v. TRUSTWAVE HOLDINGS, INC., and SINGAPORE TELECOMMUNICATIONS LIMITED,	) C.A. No. 20-371-RGA )
Defendants.	)

## STIPULATED [PROPOSED] ORDER STAYING ACTION FOR THREE MONTHS

WHEREAS, the parties have been engaged in settlement discussions and agreed to stay all deadlines in this action for three months to allow those discussions to progress; and

WHEREAS, on May 18, 2022, the Delaware Superior Court ordered Plaintiff Finjan LLC and Defendant Trustwave Holdings, Inc. to engage in mediation in the action captioned *Finjan Inc. v. Trustwave Holdings, Inc.*, C.A. No. N18C-04-006-WCC-CCLD (Del. Super. Ct.) in the event the parties' ongoing business-to-business settlement discussions do not result in a resolution of the case by June 30, 2022, where the parties have concurrently filed to a Stipulation to Stay until June 30, 2022;

IT IS HEREBY STIPULATED, SUBJECT TO THE APPROVAL OF THE COURT, that all deadlines in this action shall be stayed in their entirety through and including August 24, 2022, including the Markman Hearing scheduled for July 5, 2022 at 9:00 a.m. (D.I. 83, 150, 155). If this action is not dismissed by agreement of the parties on or before September 6, 2022, the parties shall submit a revised proposed scheduling order by September 20, 2022.

SHAW KELLER LLP	Morris, Nichols, Arsht & Tunnell llp
/s/ Andrew E. Russell Karen E. Keller (#4489) Andrew E. Russell (#5382) I.M. Pei Building 1105 North Market Street, 12th Floor Wilmington, DE 19801 (302) 298-0700 kkeller@shawkeller.com arussell@shawkeller.com Attorneys for Plaintiff  Dated: May 24, 2022	Jack B. Blumenfeld Jack B. Blumenfeld (#1014) Alexandra M. Cumings (#6146) 1201 North Market Street P.O. Box 1347 Wilmington, DE 19899 (302) 658-9200 jblumenfeld@morrisnichols.com acumings@morrisnichols.com Attorneys for Defendant Trustwave Holdings, Inc.
IT IS SO ORDERED, this day of	, 2022.

Unites States District Judge